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*Attorneys for Defendant
BUDGET VAN LINES INC.*

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MICHAEL CAPLAN, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

BUDGET VAN LINES INC., a New York
company,

Defendant.

No. 2:20-cv-00130-JCM-VCF

**NOTICE OF SETTLEMENT AND
STIPULATION TO VACATE OR
CONTINUE HEARING**

(First Request)

Plaintiff Michael Caplan (“Plaintiff”) and Defendant Budget Van Lines (individually, “Defendant” and together with Plaintiff, collectively, the “Parties”) hereby stipulate and agree as follows and respectfully request Court approval of same:

The parties jointly notify the Court that they have reached a settlement in principle. Plaintiff anticipates filing a dismissal of his individual claim with prejudice and his class claims without prejudice in the next thirty days. In light of the impending settlement and dismissal, the parties respectfully request that the hearings currently scheduled for tomorrow August 26, 2020 be vacated and/or postponed.

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So Stipulated and Respectfully Submitted,

Dated: August 25, 2020

By: /s/ Jason A. Close

Jason A. Close (Nevada Bar No. 13674)

CLOSE LAW GROUP

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By: /s/ Avi R. Kaufman

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Attorneys for Defendant Budget Van Lines Inc.

Attorneys for Plaintiff Michael Caplan

IT IS SO ORDERED,

IT IS HEREBY ORDERED that the hearing scheduled for August 26, 2020, is VACATED. IT IS FURTHER ORDERED that the proposed stipulation and order for dismissal must be filed on or before October 9, 2020.



UNITED STATES MAGISTRATE JUDGE

Dated: 8-25-2020

CERTIFICATE OF SERVICE

I certify that, on August 25, 2020, a true and correct copy of the foregoing document was served on all parties and counsel of record, via the Court's CM/ECF filing system:

/s/ Jason A. Close
Jason A. Close